REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested. Entry of this amendment is requested under Rule 116 in that it places this application in condition for allowance.

Claim amendments/Status

Claims 1-13 remain pending in the application. These claims have been amended in a manner to overcome the rejections under 35 USC 112, second paragraph.

Rejection under 35 USC § 103

The rejection of claim 1 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Acero et al. (Grammar Learning for Spoken Language Understanding) in view of Meng et al. (Semi-Automatic Acquisition of Domain-Specific Semantic Structures) and further in view of Monaco (U.S. Patent 6,434,523).

In this rejection it is admitted that Acero et al. do not specifically teach revising phraseology. To overcome this, the rejection turns to Meng et al. The rejection then admits that Acero and Meng do not specifically teach producing explanations of the conceptual model. The rejection then turns to Monaco to cure this shortcoming.

However, the Acero et al. reference discloses a method using domain-specific semantic *schema* (§ 2.1), a grammar library (§ 2.2) and performing an annotation step, i. e. attaching XML tags to semantic classes in the *schema* (§ 2.3 and 3.2) together with an automatic iterative data driven learning step (performed by a computer, see algorithm in § 3.1, and # 1 in § 5), the used data being mostly at a semantic level (§ 3.1), the syntactic level (higher level) being left aside.

The claimed method on the other hand is such that the first step is performed by a human operator who describes specific resources resulting from the building of a conceptual model of the application and using it together with a basic vocabulary specific to the application. Thereafter, a computer calculates a linguistic model for a man-machine interface using these specific resources together with generic resources (see e.g. page 4, lines 14-36). During the last steps, the operator uses revision means for refining the results (page 4, line 38 – page 5, line 8) and uses execution means for validating the interface (page 5, lines 10-14).

There is no "learning procedure" in this method, only a "revision" step performed by the operator. This step consisting of correcting terms contrary to the semantics of the application and/or add new terms to enrich the grammar of the applied field (page 3, lines 32-35). Accordingly, the combination of Acero et al., Meng et al., and Monaco fail to render the claimed subject matter. That is to say, in order to establish a *prima facie* case of obviousness, it is necessary to show that the hypothetical person of ordinary skill would, without any knowledge of the claimed subject matter and without any inventive activity, be provided with disclosure of all of the claimed elements and then motivated to arrive at the claimed subject matter given the guidance of the cited references when each is fully considered as statutorily required. It is submitted that the examiner has at least failed to meet these requirements.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the application is in condition for allowance and a Notice to that effect is earnestly solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, should any yet unresolved issues remain.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
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